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September 1, 2021

**BY ECF**

Honorable Paul G. Gardephe  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: David Fernandez, et al., v. City of N.Y., e  
17 CV 00789 (PGG)

Dear Judge Gardephe:

I am counsel for Plaintiffs in the above-captioned action. By Order dated August 27, 2021 (docket # 126) Your Honor extended the time for the parties to file motions in limine, requested voir dire, and requests to charge by one week, to September 8, 2021, and likewise extended the deadline for responsive papers by one week, to September 15, 2021. The parties had expected to file the joint pre-trial order (presently due today) at the end of last week, but due to communication issues (both myself and opposing counsel are away on vacation), and the recent retirement of opposing counsel's supervisor at the New York City Law Department, the parties have been unable to finalize the joint pre-trial order (which is essentially completed) and get it and its other associated documents filed by today. I thus respectfully request that the one week extension granted by the August 27<sup>th</sup> Order also be applicable to the joint pre-trial order and associated documents, and that the parties also be permitted to file those documents by September 8, 2021.

I tried to reach opposing counsel today – by cell phone, text, and email – to ask for his consent, but have not been able to reach him.

Thank you again for your consideration in this matter.

Respectfully submitted,

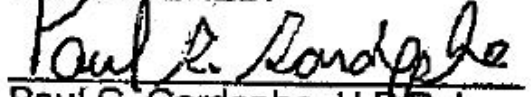
/S/

Jeffrey A. Rothman

**MEMO ENDORSED**

**The Application is granted.**

**SO ORDERED:**

  
Paul G. Gardephe, U.S.D.J.

**Dated:** September 2, 2021